REMARKS

The Applicants respectfully request reconsideration of this application in view of the above amendments and the following remarks.

35 U.S.C. §103(a) Rejection – Claims 1-35

The Examiner has rejected claims 1-35 under 35 U.S.C. §103(a) as being unpatentable over U.S. Publication No. US2004/0153694 issued to Nicholson et al. (hereinafter "Nicholson") in view of U.S. Patent No. 5,809,223 issued to Lee et al. (hereinafter "Lee"). The Applicants respectfully submit that the present claims are allowable over Nicholson and Lee.

As amended, claim 1 pertains to a method comprising:

"*requesting that an operating system place a mobile computer system in a hibernation mode;*

gathering a state of the mobile computer system, wherein the state includes contents of a central processing unit of the mobile computer system and contents of a main memory of the mobile computer system;

storing the state to a first non-volatile memory cache of the mobile computer system, wherein the first non-volatile memory cache has a storage capacity between 50-2000 megabytes; and

storing the state to a hard disk drive of the mobile computer system, which is coupled with the first non-volatile memory cache, via a transparent write-through process;

putting the mobile computer system into the hibernation mode including putting the hard disk drive into the hibernation mode; and

waking the mobile computer system from the hibernation mode including loading the state from the first non-volatile memory cache instead of from the hard disk drive".

Nicholson and Lee do not teach or suggest these limitations. In particular, as understood by Applicants, Nicholson and Lee do not teach or suggest the claimed storing the state to a non-volatile memory cache of a mobile computer system, and the claimed storing the state to a hard

disk drive of the mobile computer system through a transparent write-through process, and the claimed loading the state from the non-volatile memory cache instead of from the hard disk drive upon waking the mobile computer system from the hibernation mode, in combination with the other claim limitations.

Accordingly, claim 1 and its dependent claims are believed to be allowable over Nicholson and Lee.

As amended, claim 20 pertains to a mobile computer system comprising:

> "*a central processing unit (CPU);*
>
> *a main memory coupled to the CPU, wherein the main memory is to store data to be manipulated by the CPU;*
>
> *a first non-volatile memory cache of the mobile computer system coupled to the main memory, wherein the data is to be stored to the first non-volatile memory cache if the mobile computer system is placed in a hibernation mode, wherein the first non-volatile memory cache has a storage capacity between 50-2000 megabytes; and*
>
> *a hard disk drive of the mobile computer system coupled to the first non-volatile memory cache, wherein the hard disk drive has a greater storage capacity than the first non-volatile memory cache,*
>
> *wherein the data is to be restored from the first non-volatile memory cache instead of from the hard disk drive when the system is awoken from the hibernation mode".*

Nicholson and Lee do not teach or suggest these limitations. In particular, as understood by Applicants, Nicholson and Lee do not teach or suggest the claimed mobile computer system having the claimed non-volatile memory cache and the claimed hard disk drive, wherein the data is to be restored from the first non-volatile memory cache instead of from the hard disk drive when the system is awoken from the hibernation mode, in combination with the other claim limitations.

Accordingly, claim 20 and its dependent claims are believed to be allowable over Nicholson and Lee.

As amended, claim 30 recites in part:

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"*write contents of a central processing unit (CPU) to a non-volatile memory cache of the machine that has a same address configuration as a hard disk drive of the machine prior to the machine being placed in a hibernation mode;*

write data from a random access memory to the non-volatile memory cache of the machine prior to the machine being placed in the hibernation mode;

write the contents of the CPU to the hard disk drive of the machine using a transparent write-through process; and

initiate a load sequence from the non-volatile memory cache rather than from the hard disk drive after being awoken from the hibernation mode".

Nicholson and Lee do not teach or suggest these limitations. In particular, as understood by Applicants, Nicholson and Lee do not teach or suggest the claimed writing of the contents of the CPU to the non-volatile memory cache that has a same address configuration as the hard disk drive prior to the machine being placed in a hibernation mode, and the claimed writing the contents of the CPU to the hard disk drive using a transparent write-through process, and the claimed initiating a load sequence from the non-volatile memory cache rather than from the hard disk drive after being awoken from the hibernation mode, in combination with the other claim limitations.

Accordingly, claim 30 and its dependent claims are believed to be allowable over Nicholson and Lee.

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Conclusion

In view of the foregoing, it is believed that all claims now pending patentably define the subject invention over the cited art of record and are in condition for allowance. Applicants respectfully request that the rejections be withdrawn and the claims be allowed at the earliest possible date.

Request For Telephone Interview

The Examiner is invited to call Brent E. Vecchia at (303) 740-1980 if there remains any issue with allowance of the case.

Request For An Extension Of Time

The Applicants respectfully petition for an extension of time to respond to the outstanding Office Action pursuant to 37 C.F.R. § 1.136(a) should one be necessary. Please charge our Deposit Account No. 02-2666 to cover the necessary fee under 37 C.F.R. § 1.17 for such an extension.

Charge Our Deposit Account

Please charge any shortage to our Deposit Account No. 02-2666.

Respectfully submitted,

BLAKELY, SOKOLOFF, TAYLOR & ZAFMAN LLP

Dated: April 5, 2007   By _Brent E. Vecchia_

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